

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

CASE NUMBER: 2:06 CR 63

VIKRAM S. BUDDHI

Defendant.

MOTION TO EXTEND PRETRIAL MOTIONS DEADLINE

Comes now defendant, Vikram S. Buddhi, by counsel, John E. Martin, and moves this Honorable Court to extend the pretrial motions deadline. In support of this motion, the defense states as follows:

1. The pretrial motions deadline is May 26, 2006.
2. Limited discovery was received by the defense on May 19, 2006.
3. The defense filed this day a Motion to Suppress Defendant's Statement.
4. The defense is in need of additional time to prepare pretrial motions due to the limited discovery and the complexity of the case.
5. The government has indicated that computer forensic examination results, and the cloned hard drives of previously seized computers are not yet available to the defense.
6. The defense believes that pretrial issues will exist with regard to the forensic examinations of the hard drives.

WHEREFORE, the defense moves this Honorable Court for an extension of the thirty (30) day pretrial motions deadline of seventeen (17) days through and including June 12, 2006.

Respectfully submitted,

Northern District of Indiana
Federal Community Defenders, Inc

By: s/ John E. Martin
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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECM/ECF system which sent notification of such filing to the following:

Philip Craig Benson
philip.benson@usdoj.gov

and I hereby certify that I have mailed the document by U.S. Postal Service to the following non CM/CM/ECF participants.

s/ John E. Martin